

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	
	)	Violation: Title 18, United States
VALERIE JONES	)	Code, Section 1623(a).

The SPECIAL AUGUST 2006-2 GRAND JURY charges:

1. At times material to this indictment:

a. VALERIE JONES was an employee of the City of Chicago (“City”). From about July 2000 through January 2004, JONES worked in the Hired Truck Program Office of the City. During most of that time, she served as the assistant to Angelo Torres, who was Director of the Office for a period prior to November 2003.

b. The Hired Truck Program provided certain City departments with a mechanism to use trucking services on an as-needed basis to complete construction and operating obligations.

c. The Special August 2003-2 Grand Jury was conducting an investigation (No. 02 GJ 1348) into possible violations of federal criminal law in connection with the City’s Hired Truck Program.

2. By no later than April 2004, it was material to the Grand Jury Investigation whether VALERIE JONES and Angelo Torres had financial relationships with any vendors who participated in the Hired Truck Program. It was also material to the Grand Jury Investigation whether JONES had any recent contacts with vendors in the Hired Truck Program.

3. On or about June 24, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

VALERIE JONES,

defendant herein, was placed under oath before testifying, was advised that her testimony was subject to the penalties of perjury before the Special August 2003-2 Grand Jury in connection with Grand Jury Investigation No. 02 GJ 1348, and knowingly made false material declarations when she testified, in substance, as follows:

Q. Have you had any contact whatsoever with any of the Hired Truck vendors since you left the Hired Truck Program?

A. No.

\* \* \* \* \*

Q. Have you talked with any of the people or companies on that list who were involved in the Hired Truck Program since you left in January?

A. No.

Q. And I mean anything at all, not just limited to about the Hired Truck Program or the FBI. Have you talked with or met with any of those people at all since January about the Hired Truck Program?

A. No.

\* \* \* \* \*

Q. Was there ever a time you saw Angelo Torres with an envelope with money in it?

A. No.

Q. Did you ever see any money other than an incident with [Trucking Company Owner X], which we'll get into? Did you ever see any money being passed regarding the Hired Truck Program?

A. No.

\* \* \* \* \*

Q. Do you recall any other occasions when cash was found in the office or was seen in the office coming from a vendor?

A. No.

WHEREAS, in truth and fact, as defendant JONES then well knew:

- a. JONES had regular contact with Trucking Company Owner B, both in person and over the phone, after she left the Hired Truck Program Office
- b. JONES had given Angelo Torres an envelope from Trucking Company Owner A, containing \$1,500 in cash, in or about the summer of 2002.
- c. In addition to the envelope she passed to Torres, JONES had herself received cash and other goods from several trucking company owners, including Trucking Company Owner B, who had paid a portion of the down payment for a car for JONES.

In violation of Title 18, United States Code, Section 1623(a).

A TRUE BILL:

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FOR PERSON

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UNITED STATES ATTORNEY